

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Jesse Ventura, a/k/a James G. Janos,

**Civil No. 12-0472**

Plaintiff,

vs.

Taya Kyle, Executor of the Estate of Chris  
Kyle (deceased),

**DEFENDANT'S MOTION FOR  
SANCTIONS FOR FAILURE TO  
RESPOND FULLY TO ORDER FOR  
PRODUCTION OF MILITARY  
RECORDS**

Defendant.

Pursuant to Rules 16 and 37 of the Federal Rules of Civil Procedure, Defendant Taya Kyle, Executor of the Estate of Chris Kyle (deceased), moves for an order limiting Ventura's future testimony and evidentiary submissions on the grounds that Plaintiff counsel failed to produce full documentation regarding his military records, as required by this Court's Order dated November 6, 2012.

Dated: October 2, 2013

**FAEGRE BAKER DANIELS LLP**

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Executor of the Estate of Chris Kyle  
(deceased)